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Attorneys for Plaintiffs
Rosa Galindo; Maria Galindo

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Rosa Galindo; Maria Galindo,

Plaintiffs,

v.

Financo Financial, Inc.; Patrick Patchin;
Ahmed Yama Asefi, Aaroon Sadat and
Nazia Nawabzada; Countrywide Bank,
N.A.; Countrywide Financial Corp.;
Homecomings Financial Network;
Commonwealth Land Title Company;
Joseph Esquivel, Pamela Spikes, and
Does 1-100,

Defendants.

Case No. 3:07-cv-3991 SC

**PLAINTIFFS' MOTION TO RECOVER
REASONABLE EXPENSES OF MOTION
TO COMPEL FURTHER RESPONSES
TO DISCOVERY TO DEFENDANT
FINANCO FINANCIAL, INC.**

Date: September 5, 2008
Time: 10:00 a.m.
To be referred to Magistrate Judge

To Defendants and Their Respective Attorneys of Record:

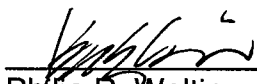
Please take notice that on September 5, 2008, at 10:00 a.m. or as soon thereafter
as the matter may be heard in the above entitled court, plaintiffs will, and hereby, do move
this Court for an order requiring that defendant Financo Financial, Inc. and/or its attorney of

1 record pay plaintiffs' counsel the reasonable expenses incurred in moving to compel further
2 responses to discovery from defendant Financo Financial, Inc.

3 If a motion to compel further responses to discovery is granted, the court must
4 require the party that refused to provide complete discovery responses, or its attorney, to
5 pay the movant's reasonable expenses incurred in making the motion, including attorney's
6 fees. F.R.C.P. 37(a)(5)(A). Plaintiffs have attempted in good faith to obtain further
7 responses from defendant short of court intervention, and there is no justification for
8 defendant to refuse to provide further responses to the discovery at issue. Accordingly,
9 plaintiffs request the costs and attorney's fees associated with plaintiffs' motion to compel
10 further responses to discovery to defendant Financo Financial, Inc. in the amount of
11 \$1,500. See Decl. of Kevin P. McLaughlin, ¶ 3.
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13 Dated: July 29, 2008

WELTIN LAW OFFICE, P.C.

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